

THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
 )  
W. R. GRACE & CO., et al.<sup>1</sup> ) Case No. 01-01139 (JKF)  
 ) (Jointly Administered)  
Debtors. )  
 ) **Related Docket No. 17693**

**NOTICE OF DEBTORS' SUBSTANTIVE OBJECTIONS TO ACC/FCR TRIAL  
EXHIBITS**

In accordance with the Court's instructions at the January 23, 2008 Estimation Hearing, Debtors, W.R. Grace & Co. ("Debtors" or "Grace"), hereby submit a list (attached hereto as Exhibit A) of exhibits listed in The Official Committee of Asbestos Personal Injury Claimants' [sic] ("ACC") and the Future Claimants' Representatives' [sic] ("FCR") Exhibit List for the Estimation Hearing (Dkt. No. 17693) for which Debtors may pose substantive objections based on the applicable Federal Rules of Evidence. With respect to those items

<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

listed in Exhibit A, Debtors have identified documents that, in the form provided by the ACC and the FCR, may not be admissible under Federal Rules of Evidence 402, 403, 408, 802 and/or any other grounds permitted.<sup>2</sup>

This list is being provided to the parties and the Court in an effort to allow the parties to cure those objections that may be cured. While Grace has attempted to provide a complete list of objections, Grace reserves its right to make any and all objections appropriate under the Federal Rules of Evidence, including all objections to relevance and foundation, to any document contained on the ACC/FCR exhibit list, and does not, through the inadvertent omission of any objection, waive such objection to any document offered by the ACC and/or the FCR. Grace further reserves its right to preserve the confidentiality of any document used by the ACC and/or FCR that has been designated as such.

With respect to any documents the ACC and FCR did not provide to Debtors in a timely manner consistent with the Revised CMO and the agreements of the parties, Grace reserves the right to amend this list should it identify any additional objections. Grace reserves all of its objections, including the right to bring any appropriate motion, with respect to any documents used or offered by the ACC or FCR on cross-examination or rebuttal, whether or not such documents have been identified on the ACC/FCR exhibit list.

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<sup>2</sup> Grace objected to the use of exhibits that might not be authentic under the Federal Rules of Evidence on January 4, 2008. *See* 1/4/08 Notice of Debtors' Authenticity Objections and Stipulation to the Admissibility of Certain Exhibits (Dkt. No. 17769). By submitting this list of substantive objections, Grace does not waive any authenticity objections and expressly reserves its right to object to those documents identified on the list of authenticity objections.

Dated: February 14, 2008

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